

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Civil No: 07-cv-4522 DSD/SRN

Antoine Khoury

Plaintiffs,

vs.

Philips Medical Systems,

Defendants,

and

ReliaStar Life Insurance Company,

Intervenor.

AFFIDAVIT OF ELISA M. HATLEVIG

STATE OF MINNESOTA)
) ss.
COUNTY OF WASHINGTON)

Elisa M. Hatlevig, being first duly sworn, deposes and states as follows:

1. That she is one of the attorneys representing Defendant Philips Medical Systems in the above-referenced matter.

2. That attached hereto as Exhibit A are true and correct copies of excerpts from the deposition transcript of Antonie Khoury.

3. That attached hereto as Exhibit B are true and correct copies of excerpts from the deposition transcript of Marnie Myhre.

4. That attached hereto as Exhibit C are true and correct copies of excerpts from the deposition transcript of Robert O. Andres, Ph.D.

15. That attached hereto as Exhibit N is a true and correct copy of the Philips Medical Systems Quotation 8771869140A dated April 25, 2001 (PHILIPS 00026-00039).

16. That attached hereto as Exhibit O is a true and correct copy of the MAVIG Arm Specifications (PHILIPS 00186-198).

17. That attached hereto as Exhibit P is a true and correct copy of the Philips Medical Systems Quotation 04510020520B dated April 8, 1996 (PHILIPS 00367-377).

18. That attached hereto as Exhibit Q is a true and correct copy of the Quotation from Unstrut for Regions Hospital – CV Room #5 – Biplane dated August 2, 2001.

19. That attached hereto as Exhibit R is a true and correct copy of the Unistrut Plans for Region's [sic] Hospital CV Room #5 dated August 30, 2001.

20. That attached hereto as Exhibit S is a true and correct copy of "Rails for Monitor Ceiling Suspension" (PHILIPS 00242-249).

21. That attached hereto as Exhibit T is a true and correct copy of the Cardiovascular Systems Clinical Education Trip Report dated January 7, 2002-January 11, 2002 (PHILIPS 00216-221).

22. That attached hereto as Exhibit U is a true and correct copy of the Preliminary Report in the Matter of Antonie Khoury dated January 29, 2007 by Robert O. Andres, Ph.D., CPE.

23. That attached hereto as Exhibit V is a true and correct copy of the Report in the Matter of Antonie Khoury v. Philips Medical Systems and MAVIG GmbH dated November 6, 2008 by Robert O. Andres, Ph.D., CPE.

24. That attached hereto as Exhibit W is a true and correct copy of the correspondence to Dr. W. Richard Marsh from Charles T. Hvass dated August 4, 2008.

25. That attached hereto as Exhibit X is a true and correct copy of the correspondence to Charles T. Hvass from W. Richard Marsh, M.D., Patty P. Atkinson, M.D. and Michael J. Yaszemski, M.D. dated September 22, 2008.

26. That attached hereto as Exhibit Y is a true and correct copy of the Report of Workability from Dr. Fozia Abrar dated November 11, 2008.

27. That attached hereto as Exhibit Z is a true and correct copy of correspondence from Dr. Miles Belgrade dated December 1, 2008.

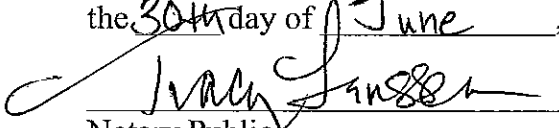
28. That attached hereto as Exhibit AA is a true and correct copy of excerpts from "Musculoskeletal Disorders and Workplace Factors: A Critical Review of Epidemiologic Evidence for Work-Related Musculoskeletal Disorders of the Neck, Upper Extremity, and Low Back", National Institute for Occupational Safety and Health (NIOSH), Second Printing July 1997.

29. That attached hereto as Exhibit BB is a true and correct copy of a photograph from the report of Dr. Laura Wojick dated February 27, 2009.

FURTHER YOUR AFFIANT SAITH NOT.


Elisa M. Hatlevig

Subscribed and sworn to before me on
the 30th day of June, 2009.


Notary Public

